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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARQUIS LAMAR FRANKLIN,
15 Defendant.

Case No. 2:17-cr-00333-APG-PAL

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Keisha K. Matthews, Assistant Federal Public Defender, counsel for Marquis Lamar Franklin,
21 that the Preliminary Hearing currently scheduled on September 14, 2023, be vacated and
22 continued to a date and time convenient to the Court, but no sooner than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Counsel for the defendant needs more time to review the discovery and prepare
25 for the hearing.
26 2. The defendant is in custody and agrees with the need for the continuance.

1 3. The parties agree to the continuance.

2 4. Additionally, denial of this request for continuance could result in a miscarriage
3 of justice.

4 5. The additional time requested herein is not sought for purposes of delay, but to
5 allow parties to negotiate.

6 6. The additional time requested by this stipulation, is allowed, with the
7 defendant's consent under the Federal Rules of Procedure 5.1 (d).

8 This is the second request for a continuance of the preliminary hearing.

9 DATED this 8th day of September 2023.

10
11 RENE L. VALLADARES
12 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney


13 /s/ *Keisha K. Matthews*
14 By _____
15 KEISHA K. MATTHEWS
 Assistant Federal Public Defender

 /s/ *Justin Washburne*
 By _____
 JUSTIN WASHBURNE
 Assistant United States Attorney

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARQUIS LAMAR FRANKLIN,
Defendant.

ORDER

DATED this 12th of September 2023.


UNITED STATES MAGISTRATE JUDGE